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## UNITED STATES DISTRICT COURT

## FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 WINE SCOUT INTERNATIONAL,

CASE NO. C 07 05930 JSW

10 Plaintiff,

11 vs.

12 PATRICIA CROWELL,

13 Defendant.

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO DISMISS THE CASE  
WITH PREJUDICE**

[Electronic digital signatures permitted]

15 PATRICIA CROWELL, an individual

16 Counterclaimant,

17 vs.

18 WINE SCOUT INTERNATIONAL, a California  
corporation,

19 Counterdefendant.

20 PATRICIA CROWELL, an individual

21 Third Party Plaintiff,

22 vs.

23 MARK STEVEN POPE, aka Mark S. Pope and aka  
Mark Pope, individually and as he does business  
under the trade name and style of Bounty Hunter,  
Bounty Hunter Rare Wine, and/or Bounty Hunter  
Rare Wine and Provisions,

26 Third Party Defendant.

CASE NO. 07 05930 JSW  
 JOINT STIPULATION RE DISMISSAL  
 WITH PREJUDICE AND  
 [PROPOSED] ORDER

1 IT IS HEREBY STIPULATED AND AGREED by and among the parties, acting through  
 2 their undersigned counsel, that, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil  
 3 Procedure, the parties jointly stipulate as follows:

- 4 1. The parties have reached a settlement following a hybrid ADR process.  
 5 2. This matter is dismissed with prejudice, each party to bear its own costs.  
 6 3. The Court will expressly retain complete jurisdiction to reopen this action for the  
 7 purpose of enforcing performance of the terms of the settlement reached by the parties with each  
 8 party consenting to the *in personam* jurisdiction of this Court for said purposes.

9  
 10 DATED: September 2, 2008

DICKENSON, PEATMAN & FOGARTY

11 By: /s/ J. Scott Gerien  
 12 J. Scott Gerien,  
 13 Attorneys for Plaintiff,  
 14 Counterdefendant, and  
 Third Party Defendant

15 DATED: September 2, 2008

BUSINESS & TECHNOLOGY LAW GROUP

16 By: /s/ Stephen N. Hollman  
 17 Stephen N. Hollman,  
 18 Attorneys for Defendant,  
 19 Counterclaimant, and  
 Third Party Plaintiff,

**[PROPOSED] ORDER**

20 After consideration of the foregoing Stipulation, IT IS HEREBY ORDERED that this action  
 21 is dismissed with prejudice, each party to bear its own costs, and the Court will expressly retain  
 22 complete jurisdiction to reopen this action for the purpose of enforcing performance of the terms of  
 23 the settlement reached by the parties with each party consenting to the *in personam* jurisdiction of  
 24 this Court for said purposes.

25 DATED: September \_\_\_, 2008

26 \_\_\_\_\_  
 Hon. Jeffrey S. White  
 27 United States District Court Judge

28 CASE NO. 07 05930 JSW  
 JOINT STIPULATION RE DISMISSAL  
 WITH PREJUDICE AND  
 [PROPOSED] ORDER